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December 30, 2014

VIA ECF

Magistrate Judge Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Chambers Room 1230
Courtroom 13B - South
Brooklyn, NY 11201

Mark G. Hanchet
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Re: *Freeman, et al. v. HSBC Holdings PLC, et al.*
14 Civ. 6601 (E.D.N.Y.)

Dear Magistrate Judge Pollak:

We represent HSBC Holdings Plc, HSBC Bank Plc, HSBC Bank Middle East Ltd., and HSBC Bank USA, N.A. (the "HSBC Defendants") in the referenced action, which was filed on November 10, 2014. We respectfully write on behalf of Defendants Barclays Bank Plc, Standard Chartered Bank, Royal Bank of Scotland, Credit Suisse AG, and the HSBC Defendants, to propose a briefing schedule for motions to dismiss the Complaint.

We propose the following briefing schedule:

Motions to dismiss to be served on or before March 2, 2015;
Opposition briefs to be served on or before May 4, 2015; and
Reply briefs to be served on or before June 5, 2015.

The proposed briefing schedule does not include Bank Saderat Plc.

In addition, Plaintiffs have stated that they intend to amend their Complaint at some point early in 2015; they also proposed a much more lengthy briefing schedule targeted off this proposed amendment. If Plaintiffs file an amended complaint defendants are willing to revisit the schedule, but to ensure compliance with the Court's rules, we are filing this extension request at this time.

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There have been no previous requests for adjournments or extensions.

Respectfully submitted,

/s/ Mark G. Hanchet

Mark G. Hanchet

MGH/phd

cc: Gary M. Osen, Esq. (via email)
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